

# ***LEEDS BROWN LAW, P.C.***

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Via ECF

June 8, 2020

Honorable Judge Arlene R. Lindsay  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: Trimboli v. County of Nassau, et al., 17-CV-7441

Dear Judge Lindsay:

This letter is written on behalf of all parties. The parties believe this matter can be settled with judicial assistance. We had the case settled, conditioned on Judge Brown's prior agreement to maintain jurisdiction, so order a settlement, and help the parties with some post-settlement issues. The parties and Judge Brown spent a massive amount of time and effort crafting a unique resolution, which everyone agreed upon. Judge Brown held at least three separate settlement conferences in an effort to mediate this settlement and the parties and counsel likely spent well over 100 hours negotiating and drafting an agreement, which is in near final form. If this Court can step into Judge Brown's shoes, the case is inches from settlement. If not, maybe the parties could find a way to resolve it with the assistance of a settlement conference. Counsel respectfully requests an opportunity to discuss this with the Court via a telephone conference. My client has also asked that I express that she wishes an audience with the Court regarding settlement. We thank the Court for its consideration.

Respectfully submitted,

LEEDS BROWN LAW, P.C.

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Rick Ostrove

Cc: Opposing Counsel (via ECF)